

1	Plaintiffs Oracle America, Inc., and Oracle International Corp. (together, "Oracle") and		
2	Defendants Rimini Street, Inc. ("Rimini") and Seth Ravin (together, "Defendants") (collectively		
3	"Parties") jointly submit this Stipulation and [Proposed] Order.		
4	WHEREAS, on July 24, 2023, the Court issued a Bench Order ruling on the Parties' claim		
5	(ECF No. 1536);		
6	WHEREAS, the Parties have met and conferred and mutually agree to extend the deadline		
7	for any motion for attorneys' fees and bill of costs and responses thereto;		
8	WHEREAS, the current deadline for any motion for attorneys' fees and bill of costs is		
9	August 7, 2023 (Fed. R. Civ. P. 54(d)(2)(B)(i), Local Rule 54-1(a));		
10	WHEREAS, the current deadline for the opposition to any motion for attorneys' fees and		
11	objections to any bill of costs is August 21, 2023 (Local Rule 7-2(b), Local Rule 54-1(c));		
12	WHEREAS, to give the Parties sufficient time to prepare their motion(s) and opposition(s)		
13	and the voluminous supporting evidence, the Parties agree to extend the deadline for any motion		
14	for attorneys' fees and bill of costs to November 6, 2023, and the deadline for the opposition to		
15	any motion for attorneys' fees and objections to any bill of costs to February 20, 2024;		
16	WHEREAS, the Parties further agree that good cause supports an expansion of the current		
17	100-page limit for exhibits accompanying motions (ECF No. 1240 (Order) at 6) to allow for up to		
18	10,000 pages of evidentiary exhibits (most of which relate to counsel's billing records and the		
19	entries therein) in conjunction with any motion for attorneys' fees and bill of costs, pending		
20	approval by the Court;		
21	WHEREAS, consistent with the Court's prior order, the Parties agree that they will		
22	"thoroughly review the evidentiary exhibits, [] organize them in an easily understood and accurate		
23	manner, and [] limit the documents submitted to only those that are necessary for the Court to		
24	analyze" in assessing any motion for attorneys' fees and bill of costs (Rimini I, ECF No. 1552		
25	(Order re Add'l Pages) at 1);		
26	WHEREAS, consistent with the Court's Rimini I order regarding the production of		
27	documents relating to Oracle's prior motion for attorneys' fees and costs (Rimini I, ECF No. 988		
28	at 3), the Parties agree that, on or before any Party files a motion for attorneys' fees and bill of		

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1	costs, that Party will produce (1) the engagement letter and fee agreements between the Party and		
2	its outside counsel (including all firms for which the filing Party is seeking fees in this litigation),		
3	covering the entire time period the filing Party is seeking fees, and (2) any guidelines the filing		
4	Party provided counsel regarding billing and representation, covering the entire time period the		
5	filing Party is seeking fees;		
6	THEREFORE, the Parties stipulate, and request that the Court order, that: (i) the deadline		
7	to file any motion for attorneys' fees and bill of costs be moved from August 7, 2023, to November		
8	6, 2023; (ii) the deadline for an opposition to any motion for attorneys' fees and objections to any		
9	bill of costs be set for February 20, 2024; and (iii) the page limit for exhibits is expanded to 10,000		
10	pages of evidentiary exhibits for any motion for attorneys' fees and bill of costs.		
11			
12	Details Assessed 2, 2022	Detail: Amount 2, 2022	
13	Dated: August 3, 2023	Dated: August 3, 2023	
14	MORGAN, LEWIS & BOCKIUS LLP	GIBSON, DUNN & CRUTCHER LLP	
15	By: /s/ Benjamin P. Smith Benjamin P. Smith	By: /s/ Eric D. Vandevelde Eric D. Vandevelde	
16	,		
17	Attorneys for Plaintiffs and Counterdefendants Oracle International	Attorneys for Defendants and Counterclaimants Rimini Street, Inc., and	
18	Corporation and Oracle America, Inc.	Seth Ravin	
19	IT IS SO ORDERED.		
20	DATED THIS 4 th Day of August 2023.		
21	DATED THIS 4 Day of August 2025.		
22	and the second		
23	MIRANDA M. DU		
24			
25	CHIEF UNITED STATES DISTRICT JUDGE		
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